UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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PASHA ANWAR, et al.,)
Plaintiffs,)
v.) Master File No. 09-CV-118 (VM)
FAIRFIELD GREENWICH LIMITED, et al.,)
Defendants.)
This Document Relates To: Headway Investment Corp. v. American Express Bank Ltd., No. 09-CV- 8500; Ricardo Lopez v. Standard Chartered Bank International (Americas) Ltd., No. 10-CV-919; Maridom Ltd. v. Standard Chartered Bank International (Americas) Ltd., No. 10-CV-920; and Maria Akriby Valladolid v. American Express Bank Ltd., No. 10-CV-918.))))))))))))
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NOTICE OF UNIFIED MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Standard Chartered Bank International (Americas) Ltd.'s, Standard Chartered Bank's, Standard Chartered PCL's and Standard Chartered International (USA) Ltd.'s (collectively, "Standard Chartered") Motion To Dismiss the operative complaints in *Headway Investment Corp.* v. American Express Bank Ltd., No. 09-CV-8500; Ricardo Lopez v. Standard Chartered Bank International (Americas) Ltd., No. 10-CV-919; Maridom Ltd. v. Standard Chartered Bank International (Americas) Ltd., No. 10-CV-920; and Maria Akriby Valladolid v. American Express Bank Ltd., No. 10-CV-918., dated March 10, 2010, Standard Chartered will move this Court, before the Honorable Victor Marrero, at a time and place to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order

pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure dismissing with prejudice plaintiffs' complaints in their entirety, and for such further and other relief that the Court may deem just and proper.

Dated: New York, New York March 10, 2009

Respectfully submitted,

/s/ Sharon L. Nelles

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